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Via E-file and Fax (973-776-7865)

Hon. Cathy L. Waldor, U.S.M. J.
United States District Court
50 Walnut Street
Newark, New Jersey 07101

Re: Caesar Velazquez v. A-Tech Electric, Inc., Vertical Solutions, Inc., et al.
USDCNJ Case No.: 2:15-cv-03624
Our File No.: 8106.48316

Dear Judge Waldor:

Fact discovery in the above matter is set to close on November 1, 2016. The parties have exchanged written discovery and depositions have been scheduled. However, due to scheduling conflicts with the witnesses and counsel, we will not be able to complete depositions by the current deadline.

Pursuant to this Court's Scheduling Order dated November 17, 2015, all parties jointly request this Honorable Court continue the upcoming deadline for discovery and adjust the Court's present Scheduling Order as follows:

December 15, 2016: End date of discovery.

January 2, 2016: Telephone Conference with the Court

January 31, 2016: Final Pretrial Conference with the Court

Thank you for your attention to this matter.

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Respectfully submitted,

FREEMAN MATHIS & GARY, LLP

/s/ Meaghan P. Londergan

Meaghan P. Londergan

cc: Leonard E. Seaman, Esq.
Diane M. Shelley Esq.

MPL/rds/bi

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